

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In the matter of:

United States of America	:	Case No.: 2:24-mj-485
v.	:	
Terrance Parrish Cummings	:	
3198 Chateau Morse Court	:	Magistrate Judge: Vascura
Columbus, Ohio 43231	:	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Josh Saltar (Your Affiant), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I, Special Agent Josh Saltar (your affiant), make this affidavit in support of a criminal complaint to arrest for violations 18 U.S.C. §§ 2251, 2252A, and 2422(b) – the sexual exploitation of a minor, distribution, receipt, and/or possession of child pornography and the coercion and enticement of a minor as well as 18 U.S.C. §1503 -obstruction of justice. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Terrance P. Cummings (**CUMMINGS**) committed the violations listed above.
2. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since October 2014. I am currently assigned to the Child Exploitation and Human Trafficking Task Force, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have worked with multiple international law enforcement agencies around the world, focusing on cyber-terrorism and terrorist financing through computer intrusions. I have also assisted on various cases and violations, ranging from violent crimes against children and white collar to healthcare fraud, counterintelligence, and counterterrorism.
3. As part of my duties as a Special Agent, I investigate criminal violations relating to child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18

U.S.C. §§ 2251, 2252, and 2252A. I have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

4. Prior to joining the FBI, I spent four years working as a civilian Intelligence Specialist for the U.S. Air Force at the National Air and Space Intelligence Center located at the Wright-Patterson Air Force Base, under both the cyber and counterspace squadrons, performing classified intel and reverse engineering duties. During my employment, I have received numerous forensic trainings with the both the Department of Defense and Department of Justice, as well as from private sector security conferences. I have received multiple certifications in Windows, mobile, and memory forensics, as well as incident response and penetration testing, and am certified by the Department of Justice as a Digital Extraction Technician. I received my B.A. from Anderson University in computer science, with a focus on programming, artificial intelligence, and machine learning. As a SA with the FBI, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

FACTS SUPPORTING PROBABLE CAUSE

Background of Terrance Cummings Prior Conviction and Violations

5. On or about September 9, 2016, **CUMMINGS** was indicted by the grand jury in the Franklin County Court of Common Pleas, under case number 16CR-5001, for two counts of Unlawful Sexual Conduct with a Minor, a felony of the fourth degree, in violation of Ohio Revised Code, Section 2907.04. These charges related to an incident involving Jane Doe One, DOB: 08/2000, who had disclosed that she met **CUMMINGS** on social media and, after talking online, agreed to meet him in person at his residence. Jane Doe One disclosed that at his residence, **CUMMINGS** put his hand down her pants and touched her vagina and engaged in unprotected vaginal sex with her. Jane Doe One stated she attempted to push **CUMMINGS** off her but could not. Jane Doe One was medically evaluated after the incident and results indicated vaginal transections as well as bleeding and bruising on the vagina.
6. On or about August 30, 2017, **CUMMINGS** plead guilty to the stipulated lesser included offense of Unlawful Sexual Conduct with a Minor, a misdemeanor in the first degree, and was required to register as a Tier I Sex Offender for fifteen years. Additionally, he was sentenced to 180 days incarceration on each count, a sentence which was ultimately suspended in lieu of 24-months of reporting probation.
7. On or about June 4, 2019, a revocation hearing was requested based on violations of the conditions of **CUMMINGS**' probation. The violation report noted that **CUMMINGS** failed to report to probation, had failed to complete sex offender counseling, failed to refrain from possession pornography, and failing to refrain from contact with victims and minors. A revocation hearing was held, and monitoring software was installed on the cellular device of **CUMMINGS**.

8. In September 2019, an additional revocation hearing was requested based on new violations that **CUMMINGS** had turned off his monitoring software and admitted to having sexual contact with minors, using Snapchat to view videos of drug use and sexual videos that included minors, and also admitted to viewing nude photos of others generally. On or about October 23, 2019, **CUMMINGS** was sentenced to 180 months incarceration for the various violations he had committed, and his case was closed.
9. On or about October 13, 2021, **CUMMINGS** was indicted by a grand jury in the Franklin County Court of Common Pleas for Failure to Provide Notice of Change of Address, a felony in the fourth degree, violation of ORC 2950.05. It was charged under case number 21 CR 004499. **CUMMINGS** pled guilty to that charge on or about August 17, 2022 and was sentenced that same day to three years of community control and placed on non-reporting supervision.

Background Investigation Related to Terrance Cummings Continued Criminal Activities

10. On or about April 4, 2022, Westerville Police Department (WPD) conducted a traffic stop on **CUMMINGS**, the investigation of which was documented under case number 2022-00010330. As a result of the traffic stop, which was drug related, **CUMMINGS** and his vehicle were searched and marijuana, several boxes of suspected hash liquid cartridges, a digital scale, and two cell phones were seized.
11. As a result of the traffic stop, **CUMMINGS** was indicted by the grand jury in the Franklin County Court of Common Pleas on or about October 13, 2023 for two counts of Trafficking in Drugs, a felony in the fifth degree, violation of ORC 2925.03, under case number 23CR-5314. On or about May 8, 2024, **CUMMINGS** pled guilty to one of the charges and was sentenced that same day to community control for two years.

The Current Investigation of Recent Child Exploitation Activities by Terrance Cummings

12. On or about July 11, 2024, the Central Ohio Human Trafficking Task Force (COHTTF), which your affiant is a member of, received a tip from Nationwide Children Hospital (NCH) that Minor Victim One, an approximately 16-year-old female (MV1) was being trafficked by **CUMMINGS** and provided the contact information for John Doe One (herein after JD1) as a point of reference, who was a relative of MV1.
13. On July 12, 2024, the COHTTF completed an interview of JD1, who stated he thought **CUMMINGS** was bribing MV1 with presents. When law enforcement inquired further, JD1 stated **CUMMINGS** purchased approximately \$400 worth of clothes and left them on JD1's porch steps around MV1's birthday. JD1 informed law enforcement that MV1 admitted to using Xanax, cocaine, marijuana, and methamphetamines. However, JD1 stated that he and MV1 did not discuss in detail what MV1 had to do in order to get the drugs from **CUMMINGS**.

14. On or about July 25, 2024, the COHTTF was contacted by a case worker at NCH, who had conducted a follow up visit with MV1. NCH provided the COHTTF with information told to them by MV1, who stated that **CUMMINGS** had sex with girls that want drugs and valuables from them. MV1 disclosed that she had sex with **CUMMINGS** in exchange for drugs and that he had done the same thing with four other minors MV1 knew. MV1 stated she was drugged multiple times by **CUMMINGS** after which he had sex with her.
15. On or about August 12, 2024, law enforcement interviewed Minor Victim Two (MV2), an approximately 18-year-old female, who stated that she was a sophomore in high school when she first met **CUMMINGS**. According to MV2, **CUMMINGS** and MV2 would communicate over Snapchat, and in those communications, **CUMMINGS** requested pictures of MV2 fully naked and told MV2 what positions he wanted the pictures taken in. **CUMMINGS** also asked MV2 for sexual favors. MV2 stated that she thought that **CUMMINGS** might have recorded the sexual encounter with her on a phone, but she wasn't sure since she was not coherent at the time.
16. On or about August 13, 2024, the COHTTF interviewed MV1, who stated that she met **CUMMINGS** when she was a freshman in high school, when she was approximately 14 years old. MV1 stated that **CUMMINGS** would buy her gifts, and sometimes he would give her the gifts for free, but other times he wanted her to do a sexual favor to receive the gift. MV1 stated that most of the time **CUMMINGS** would provide drugs to her in exchange for sex. MV1 stated that **CUMMINGS** would offer her marijuana or Xanax at his apartment, and then expect MV1 to engage in sexual acts with him in exchange. MV1 stated that **CUMMINGS** showed her a video he recorded of him receiving oral sex from MV1. MV1 stated she witnessed **CUMMINGS** sell pressed and powdered fentanyl, marijuana, Xanax, and cocaine out of his apartment on Chateau. MV1 stated that **CUMMINGS** asked her to send him nude images and videos, which she did over Snapchat.
17. Further investigation into previous outrides by minors about **CUMMINGS** revealed that on or about June 1, 2023, Minor Victim Three, an approximately 15-year-old female (MV3), reported to a social worker at NCH that she had been sexually assaulted by **CUMMINGS**. MV3 disclosed that she bought pills, specifically acid and ecstasy, from **CUMMINGS**, while in a parking lot in the Stoneridge area of Gahanna. MV3 stated at that time, MV3 was forced to perform oral sex on **CUMMINGS** after **CUMMINGS** threatened to hit MV3 if she did not engage in the sexual act. In an additional interview with MV3 in October 2024, she clarified that she used to just purchase marijuana from **CUMMINGS** and that on one occasion, she performed oral sex on **CUMMINGS** in his vehicle in exchange for weed. MV3 stated she felt pressured to do this because **CUMMINGS** carried a gun in his vehicle.
18. On August 20, 2024, a federal search warrant was obtained for the residence of **CUMMINGS** at the address of 3198 Chateau Morse Court. On or about August 22, 2024, that search warrant was executed.
19. Upon arriving at the residence at approximately 6:00 AM, FBI agents contacted **CUMMINGS** via his telephone number. When **CUMMINGS** answered the phone, FBI

agents informed him of their presence outside his residence for a search warrant and requested **CUMMINGS** exit the residence, to which **CUMMINGS** confirmed he would come out. Several minutes later, **CUMMINGS** exited the residence without any devices on his person.

20. A search of **CUMMINGS** residence resulted in numerous items being seized including digital media devices as well as pills and various amounts of fentanyl, Alprazolam pills (Xanax), cocaine, methamphetamine, Psilocyn (mushrooms), and amphetamine.
21. **CUMMINGS** was ultimately arrested and charged in Franklin County with Possession of Controlled Substances in violation of ORC Section 2925.11 and Tampering with Evidence in violation of ORC 2921.12.
22. In addition, during the search of **CUMMINGS** residence, two Apple iPhones were recovered submerged in the water tank on the back of the bathroom toilet, specifically an iPhone 14 and an iPhone 15 Pro. Forensic review of the iPhone 14 indicated that the phone number assigned to the device was the same on FBI agents spoke to **CUMMINGS** upon arrival at his residence to execute the search warrant. Additionally, the forensic review identified an incoming call at approximately 6:02 AM from the same phone number that was assigned to the FBI agent that placed the call to **CUMMINGS**.
23. Forensic review of the iPhone 15 Pro also identified an outgoing text message at approximately by **CUMMINGS** to an unknown individual at approximately 6:04 AM which stated, “FBI don’t text back”.
24. During a preliminary review of the iPhone 14, your affiant identified a Dropbox account associated to **CUMMINGS**. The Dropbox account contained approximately 18,000 images and videos, most of which were not stored locally on the device. The Dropbox account contained approximately 80 folders, with some of the titles list as a female’s name, listed as “nudes,” or listed as a female’s name plus the word “nudes.”
25. On September 4, 2024, your affiant obtained and executed a federal search warrant signed in the Southern District of Ohio for **CUMMINGS**’ Dropbox account. During a review of the return Dropbox provided, your affiant noted that a substantial amount of the images and videos noted above depicted age questionable and possibly minor females nude and engaged in sex acts with males, acts of masturbation, and/or showing their vagina, anus, or pubic region. In addition, your affiant identified a folder titled “stuff i bought” which contained approximately 15 videos and 16 images of Minor Victim Four, an approximately seventeen-year-old female (herein after MV4) masturbating in various stages of undress and nude. Metadata associated with the images and videos indicated they were taken on or before February 20, 2023.
26. On October 1, 2024, an interview was conducted with MV4, who stated she met **CUMMINGS** when she was 17 years old and still in high school. MV4 stated that **CUMMINGS** knew of her age when she met him. MV4 identified herself in sanitized images which were recovered from the **CUMMINGS** Dropbox account and confirmed that

she sent the images and videos when she was 17 years old. MV4 stated that **CUMMINGS** had directed her on what to do and what positions to pose in for the images and videos. **CUMMINGS** would provide her different things in exchange for the content including money, gifts, and drugs.

27. Further investigation revealed that after **CUMMINGS** was arrested on the charges in Franklin County, he spoke to MV4 while incarcerated on September 12, 2024. In that call, **CUMMINGS** asked MV4 to download two mobile applications for him – Dropbox and OneDrive. **CUMMINGS** provided MV4 emails and passcodes for both accounts and asked MV4 to delete specific folders from the accounts for him and then delete the files further from the “recently deleted, trash can, and recycle bin” too. **CUMMINGS** then asked MV4 to change the passwords to the accounts to something she will remember. In the same conversation, **CUMMINGS** also asked MV4 to review his Snapchat account and directs her to specific folders in the account including the “My Eyes Only” account. He then directed her to change the password to his Snapchat account and then delete it in its entirety.
28. Based upon the foregoing, your affiant submits that there is probable cause to believe that Terrance **CUMMINGS** has committed the violations 18 U.S.C. §§ 2251, 2252A, and 2422(b) – the sexual exploitation of a minor, distribution, receipt, and/or possession of child pornography and the coercion and enticement of a minor as well as 18 U.S.C. §1503 -obstruction of justice. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Respectfully submitted,

Josh Saltar

Josh Saltar
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on October 8, 2024

Chelsey M. Vascura

Honorable Chelsey M. Vascura
United States Magistrate Judge
United States District Court
Southern District of Ohio